



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

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*The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007*

July 7, 2020

**VIA ECF**

The Honorable Alison J. Nathan  
United States District Court  
Southern District of New York  
United States Courthouse  
40 Foley Square  
New York, New York 10007

**Re:    *United States v. Ghislaine Maxwell, 20 Cr. 330 (AJN)***

Dear Judge Nathan:

The Government respectfully submits this letter in connection with the Court's Order dated July 6, 2020 (the "Order") (Dkt. 7) and the defendant's letter of July 6, 2020 (the "Defense Letter") (Dkt. 8). Pursuant to the Order, the parties have conferred regarding the scheduling of an initial proceeding in the above-captioned case. As set forth in the Defense Letter, the parties are available to proceed remotely on the morning of July 14, 2020. Additionally, the parties jointly respectfully propose the following briefing schedule in connection with the Government's Memorandum in Support of Detention, dated July 2, 2020 (Dkt. 4):

- Defense response to be due by 3:00 p.m. on Friday, July 10, 2020
- Government reply to be due by 5:00 p.m. on Monday, July 13, 2020

The Government also respectfully renews and amends its request that the Court exclude time under the Speedy Trial Act, *see* Government Letter dated July 5, 2020 (Dkt. 5), between the defendant's arrest on July 2, 2020, and the revised proposed date of the arraignment, initial appearance, and bail hearing. In the interim, the Government intends to confer with defense counsel regarding the terms of a protective order and initial discovery, to facilitate the production

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of discovery, which will serve the interests of justice by facilitating the timely production of discovery materials. *See* 18 U.S.C. § 3161(h)(1)(F). I have conferred with defense counsel, who consent to this request.

Very truly yours,

AUDREY STRAUSS  
Acting United States Attorney

By:   
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Cc: Christian Everdell, Esq., and Mark Cohen, Esq., *counsel for defendant*